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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

**DAEBO INTERNATIONAL SHIPPING
CO., LTD.,**

Debtor in a Foreign Proceeding

Chapter 15

Case No. 15-10616 MEW

**AMERICAN MARINE SERVICES, INC.'S
MOTION TO STAY VACATUR ORDER PENDING APPEAL**

NOW INTO COURT, through undersigned counsel, comes American Marine Services, Inc. ("AMS") and respectfully moves this Honorable Court pursuant to Rule 8005 of the Federal Rules of Bankruptcy Procedure and the parties Stipulation (Record Doc. 78) to stay the vacatur order pending appeal of the December 15, 2015 Opinion and Order granting the Motion of Chang-Jung Kim, the custodian and foreign representative (the "Foreign Representative") of Daebo International Shipping Co. Ltd. seeking to vacate certain maritime attachments. The basis for AMS's instant Motion is the same as that explained in the Motion to Stay Vacatur Order Pending Appeal filed by SPV 1, LLC and the Memorandum of Law in Support of Motion to Stay Vacatur Order Pending Appeal (collectively the "SPV Filings"). *See* Record Docs. 83 and 84

Dated: January 6, 2016

Respectfully submitted,

FRILOT, LLC

/s/ T. Patrick O'Leary

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AFFIRMATION OF SERVICE

I hereby certify that on January 6, 2016, a copy of the foregoing pleading was filed electronically and served by e-mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by e-mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system. Further a copy of this filing was sent to counsel for Daebo via e-mail and first class mail.

/s/ T. Patrick O'Leary